UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

LISA RICCOBENE)	
Plaintiff)	
)	
v.)	C.A. No. 04-10256-MEL
)	
MASSACHUSETTS BAY)	
TRANSPORTATION AUTHORITY)	
And)	
ANNE McCALL)	
Defendants)	
)	

JOINT MOTION TO EXTEND PRETRIAL SCHEDULE BY NINETYDAYS

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial schedule in this case by ninety days.

Specifically, it is requested that the pretrial schedule be extended as follows:

- 1. Close of fact discovery-extended from August 16, 2005 through November 14, 2005.
- 2. Date for filing of summary judgment motions-extended from October 16, 2005 through January 14, 2006.
- 3. Date for filing opposition to summary judgment motions-extended from November 16, 2005 through February 14, 2006.

As grounds for this motion, the parties state that additional time is needed to finish discovery in this action, particularly given the summer schedule of the parties, counsel and witnesses.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, and the pretrial schedule in this case extended as set forth above.

Lisa Riccobene By her attorney

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CERTIFICATE OF SERVICE

I, Mitchell J. Notis, hereby certify that on July 28, 2005, I caused to be served upon counsel for all parties of record, a copy of the foregoing Joint Motion by mailing the same by first class mail, postage prepaid.

Mitchell/J. Notis